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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

FREEDOM MORTGAGE CORPORATION,
a New Jersey Corporation,

Plaintiff,

vs.

JAMES S. KENT, as Trustee of the 6221 RED
PINE TRUST, a Nevada Trust; JAMES B.C.
NELSON, an Individual; TORREY PINES
ESTATES HOMEOWNERS ASSOCIATION, a
Nevada nonprofit corporation; Nevada DOE
DEFENDANTS I through X; ROE
CORPORATIONS I through X,

Defendants.

Case No.: 2:19-cv-1411 -APG-DJA

**STIPULATION AND ORDER TO
DISMISS TORREY PINES ESTATES
HOMEOWNERS ASSOCIATION**

Plaintiff, FREEDOM MORTGAGE CORPORATION ("Freedom"), by and through its attorneys of record, the law firm of Gerrard Cox Larsen and Defendant TORREY PINES ESTATES HOMEOWNERS ASSOCIATION ("Torrey Pines"), by and through its counsel of record, Maddox, Isaacson & Cisneros, LLP hereby agree and stipulate as follows:

IT IS HEREBY STIPULATED that Defendant Torrey Pines is dismissed with prejudice as to all claims made by Plaintiff Freedom.

IT IS FURTHER STIPULATED that Defendant Torrey Pines disclaims any claim or interest in that certain real property located at 6221 Red Pine Ct., Las Vegas, Nevada 89130 APN No. 125-26-111-028 ("Property").

IT IS FURTHER STIPULATED that Torrey Pines shall maintain any and all rights to enforce the governing documents (Declaration, Bylaws, Rules & Regulations, etc.), and provisions of Nevada law against the home. This would include, but is not limited to, architectural

1 enforcement, the collection of assessments and foreclosure for any future nonpayment of
2 assessments.


3 **IT IS FURTHER STIPULATED** that any Subpoenas for the production of documents
4 and/or deposition of witnesses which is directed to Torrey Pines in this litigation may be served by
5 delivering a copy to Maddox, Isaacson & Cisneros, LLP without need for a process server.

6 **IT IS FURTHER STIPULATED** that Torrey Pines and Freedom will bear their own
7 attorneys' fees and costs in conjunction with the above-referenced litigation

8 **IT IS SO STIPULATED.**


9 Dated this 14th day of October, 2019.

10 **GERRARD COX LARSEN**

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19 *Attorneys for Freedom*
20 *Mortgage Corporation*

Dated this 11th day of October, 2019.


**MADDOX, ISAACSON &
CISNEROS, LLP**

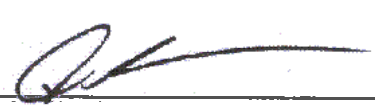
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22 _____
23 Troy L. Isaacson, Esq.
24 Nevada Bar No. 6690
25 11920 Southern Highlands Pkwy., Ste. 100
26 Las Vegas, NV 89141
27 *Attorneys for Torrey Pines Estates*
28 *Homeowners Association*

19 **IT IS SO ORDERED.**

22 Respectfully submitted by:

23 **GERRARD COX LARSEN**

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25 _____
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28 Fredrick J. Biedermann, Esq.
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Attorneys for Plaintiff Nationstar Mortgage

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22 _____
23 UNITED STATES DISTRICT JUDGE
24 Dated: October 15, 2019.